

GLAVIN PLLC  
2585 Broadway #211  
New York, New York 10025  
646-693-5505

May 25, 2021

**VIA ECF**

Honorable Loretta A. Preska  
U.S. District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: United States v. Donziger, 19 Cr. 561 (LAP); [11 Civ. 691 (LAK)]

Dear Judge Preska:

I represent the United States and write to supplement the record with respect to the Court's May 15, 2021 order (Dkt. 308), which was docketed on May 18, 2021.

On Saturday, May 15, 2021 at 5:10 p.m., defense counsel Ronald Kuby emailed the Court and copied the Special Prosecutors and others (including defense attorneys Martin Garbus and Rhiya Trivedi and defendant Steven Donziger). That email is attached as Exhibit A. Later that same day, at 9:56 PM, your Honor's Chambers emailed defense counsel (i.e., Mr. Kuby, Mr. Garbus and Ms. Trivedi) and the Special Prosecutors attaching the May 15, 2021 order. That email is attached as Exhibit B. The May 15, 2021 order was later docketed on May 18, 2021 as Dkt. 308, with a filing date of May 15, 2021—the date the order was sent to the parties.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
Rita M. Glavin

*Special Prosecutor on behalf  
of the United States*